

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) Bankruptcy No. 15-20632 GLT
Eve F. Beahm,)
Debtor,) Chapter 13
PNC Bank, National Association)
Movant,) Related Claim No. 5
vs.)
Eve F. Beahm,)
Respondent.) Document No.

DECLARATION THAT THE EXISTING CHAPTER 13 PLAN IS SUFFICIENT

AND NOW, comes the Debtor, Eve F. Beahm, by and through her attorneys,
CALAIARO VALENCIK and David Z. Valencik, and presents the following:

1. This case was originally filed on February 26, 2015.
2. A notice of mortgage payment change was filed on November 2, 2017, change the Debtors Mortgage payment to \$627.18.
3. The Debtor's Amended Plan dated September 7, 2017 provides for a payment in the amount of \$644.06
4. There is no reason to amend the Debtor's Chapter 13 Plan.

Respectfully submitted,

Dated: November 22, 2017

BY: /s/ Donald R. Calaiaro
Donald R. Calaiaro, Esquire, PA I.D. #27538
[**dcalaiaro@c-vlaw.com**](mailto:dcalaiaro@c-vlaw.com)
BY: /s/ David Z. Valencik
David Z. Valencik, Esquire, PA I.D. #308361
[**dvalencik@c-vlaw.com**](mailto:dvalencik@c-vlaw.com)
BY: /s/ Michael Kaminski
Michael Kaminski, Esquire, PA I.D. 53493
[**mkaminski@c-vlaw.com**](mailto:mkaminski@c-vlaw.com)
CALAIARO VALENCIK
428 Forbes Avenue, Suite 900
Pittsburgh, PA 15219-1621
(412) 232-0930

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**CERTIFICATE OF SERVICE OF Declaration that the Existing
Chapter 13 Plan is Sufficient**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on November 29, 2017.

Service by First Class Mail:

Eve F. Beahm; 135 Lebeouf Drive, New Kensington, PA 15068

Service by NEF:

James Warmbrodt on behalf of Creditor PNC Bank, N.A. bkgroup@kmlawgroup.com

Office of the United States Trustee ustregion03.pi.ecf@usdoj.gov

Ronda J. Winnecour cmecf@chapter13trusteewdpa.com

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: First-Class Mail or Electronic Notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

Executed on: November 29, 2017

/s/ Donald R. Calaiaro

Donald R. Calaiaro, Esquire, PA I.D. #27538

dcalaiaro@c-vlaw.com

/s/ David Z. Valencik

David Z. Valencik, Esquire, PA I.D. #308361

dvalencik@c-vlaw.com

/s/ Michael Kaminski

Michael Kaminski, Esquire, PA I.D. 53493

mkaminski@c-vlaw.com

CALAIARO VALENCIK

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Pittsburgh, PA 15219-1621

(412) 232-0930